

UNITED STATES DISTRICT COURT

for the
District of Massachusetts

Abbas Jafarian

Plaintiff

v.

John Doe

Defendant

Civil Action No. 1:19-cv-11205-RWZ

SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION

To:

Knock Knock Whois Not There LLC

(Name of person to whom this subpoena is directed)

☒ **Production:** **YOU ARE COMMANDED** to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attachment A.

Place: Brown Rudnick LLP
One Financial Ctr., 18th Flr.
Boston, MA 02111

Date and Time:

06/14/2019 9:00 am

☐ **Inspection of Premises:** **YOU ARE COMMANDED** to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:

Date and Time:

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.


Date:

June 5, 2019

CLERK OF COURT

Signature of Clerk or Deputy Clerk

OR



Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (name of party)

Abbas Jafarian, who issues or requests this subpoena, are:

Edward Naughton, One Financial Ctr, Boston, MA 02111 617-856-8200 enaughton@brownrudnick.com

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

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PROOF OF SERVICE

(This section should not be filed with the court unless required by Fed. R. Civ. P. 45.)

I received this subpoena for *(name of individual and title, if any)* _____
on *(date)* _____.

☐ I served the subpoena by delivering a copy to the named person as follows: _____
_____ on *(date)* _____; or

☐ I returned the subpoena unexecuted because: _____
_____.

Unless the subpoena was issued on behalf of the United States, or one of its officers or agents, I have also
tendered to the witness the fees for one day's attendance, and the mileage allowed by law, in the amount of
\$ _____.

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____
_____ *Server's signature*

Printed name and title

Server's address

Additional information regarding attempted service, etc.:

Attachment A

Instructions

1. If objection is made to any request, the reasons for that objection must be stated, and if any objection is made to part of a request, item, or category, the part must be specified and permit production with respect to the remainder of the request.

2. This subpoena calls for documents to the extent that they may be located by searching likely repositories of hard copy documents and e-mail files.

3. This subpoena is not intended to call for the production of privileged attorney-client communications, and it is not intended to call for the production of protected attorney work product. If any documents are withheld on the grounds of privilege, work product, or other grounds, you are requested to provide a log of such documents providing a reasonable identification of them by type of document, general subject matter of the document, date of the document, and all author(s), sender(s), addressee(s), and recipient(s) and the grounds for withholding such document. Such a log should be provided to Defendants' attorneys on or before the time specified in this request for the production of documents.

4. Unless otherwise specified, all documents requested below are for the time period of June 1, 2018 to the present.

Definitions

For purposes of this request for production, plaintiff adopts the Uniform Definitions in Discovery Requests set forth in D. Mass. Local Rule 26.5 (<http://www.mad.uscourts.gov/general/pdf/LC/D-MA%20Local%20Rules%20-%20red%20lined.pdf>). The following additional terms shall have the meanings set forth below:

1. The term “Domain Name Registration” shall mean the registration associated the domain name www.abbas-jafarian.com.

2. The term “IP Address” shall mean the Internet Protocol address assigned to a computer or device.

3. The terms “and” as well as “or” shall be construed both disjunctively and conjunctively, as necessary, to bring within the scope of the request all responses that might otherwise be construed to be outside its scope; in other words, to give each request its broadest possible meaning.

4. The term “any” shall be construed also to mean “all,” and “all” shall be construed also to mean “any.”

5. The term “including” shall mean “including but not limited to.”

Document Requests

1. All registrant account information concerning the Domain Name Registration or any related accounts.

2. All documents concerning the identity of the person or entity who registered or acquired the Domain Name Registration, including:

a. any name, address, phone number, credit card, screen name, email address, or other registration information provided at the time that the Domain Name Registration was first created; and

b. any name, address, phone number, credit card, screen name, email address, or other identifying information associated with the Domain Name Registration from the time it was first created through the present.

3. Documents sufficient to identify all occasions on which the administrative dashboard or other account management tool associated with the Domain Name Registration was accessed from its first creation through the present, including for each such occasion:

- a. the date, time, and duration of access; and
- b. the IP Address of the computer or other device that was used to access the dashboard or other account management tool.

4. Any and all documents concerning any billing records or records of payment associated with the Domain Name Registration.

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